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Attorneys for Creditor and Party-in-Interest
SONOMA CLEAN POWER AUTHORITY

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

In re) **Case No. 19-30089**
PACIFIC GAS and ELECTRIC COMPANY,) **Chapter 11**
Debtor.)

In re) **Case No. 19-30088**
PG&E CORP.,) **Chapter 11**
Debtor.) **REQUEST FOR NOTICE AND INCLUSION**
IN MAILING LIST
Date:
Time:
Courtroom: 17
Place: 450 Golden Gate Ave., 16th Floor
San Francisco, CA 94102
Judge: Hon. Dennis Montali

1 PLEASE TAKE NOTICE that Engel Law, P.C., Boutin Jones Inc. and Jessica R. Mullan,
2 General Counsel are counsel of record in the above-captioned cases on behalf of Sonoma Clean
3 Power Authority, a California joint powers authority¹ and a “governmental unit” (as defined in
4 Bankruptcy Code section 101) (“SCPA”).

5 Pursuant to Federal Rules of Bankruptcy Procedure, Rules 2002, 9007 and 9010(b), and
6 Sections 102(1), 342 and 1109(b) of the Bankruptcy Code (Title 11, United States Code), SCPA
7 hereby requests that copies of all notices, pleadings or papers given or required in this case and
8 copies of all notices, pleadings or papers served or required to be served in this case be given to and
9 served upon the following.

10 G. Larry Engel
11 Engel Law, P.C.
12 12116 Horseshoe Lane
13 Nevada City, CA 94123
14 Email: larry@engeladvice.com

15 -and-

16 Mark Gorton
17 Boutin Jones Inc.
18 555 Capitol Mall, Suite 1500
19 Sacramento, CA 95814
20 Email: mgorton@boutinjones.com

21 -and-

22 Jessica Mullan, General Counsel
23 Sonoma Clean Power Authority
24 50 Santa Rosa Avenue, Fifth Floor
25 Santa Rosa, CA 95494
26 Email: jmullan@sonomacleanpower.org

27 PLEASE TAKE FURTHER NOTICE that the foregoing request encompasses, without
28 limitation, notice of any and all orders, notices, petitions, schedules, statements, pleadings,
applications, motions, requests or demands, whether formal or informal, written or oral, regardless
how transmitted, that affect or purport to affect in any way any rights or interests of the debtor or any
creditors or parties in interest in this case.

¹ The governmental units that are members of the SCPA joint powers authority are Cloverdale,
Cotati, Petaluma, Santa Rosa, Rohnert Park, Sebastopol, Sonoma, Sonoma County (unincorporated
areas), Windsor, Fort Bragg, Willits, Point Arena, and Mendocino County (unincorporated areas).

1 PLEASE TAKE FURTHER NOTICE that the foregoing request is subject to the reservation
2 of rights contained in the attached **Exhibit A**.

3 DATED: January 29, 2019

BOUTIN JONES INC.

4
5 By: 

Mark Gorton

6 -and-

7 ENGEL LAW, P.C.
8 G. Larry Engel

9 -and-

10 SONOMA CLEAN POWER AUTHORITY
11 Jessica R. Mullan, General Counsel

12 *Attorneys for Creditor and Party-in-Interest*
13 *SONOMA CLEAN POWER AUTHORITY*
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EXHIBIT A

RESERVATION OF RIGHTS

Except as provided above, nothing herein nor in any other appearance, pleading, claim, proof of claim, suit, motion or any other writing or conduct shall constitute a waiver by SCPA of any procedural or substantive rights, remedies, claims, or defenses including, without limitation: (a) the right to have all matters, except monetary "damages claims," probation violations, and criminal complaints, heard and resolved by the California Public Utilities Commission; (b) the right to have any and all final orders in any and all matters entered only after de novo review by a United States District Court Judge; (c) the right to have any matter heard and tried before an Article III court or, in the event of any applicable Chapter 9 case, such other bankruptcy court; (d) the right to trial by jury in any proceeding as to any and all matters so triable therein, whether or not the same be designated legal or private rights, or in any case, controversy or proceeding related hereto, whether or not such jury trial right is pursuant to statute or the United States Constitution, as well as the rights of State governmental units as such for sovereign immunity or under applicable laws, including the Fifth and Tenth Amendments; (e) the right to have the reference of this matter withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; (f) other rights, claims, actions, remedies, defenses, setoffs, recoupments or other matters to which SCPA is entitled under any agreements or at law or in equity or under the United States Constitution, including those protecting public funds or which may be enforced as police or regulatory powers under Section 362(b)(4) or under 28 U.S.C. § 959; and (g) the right to be served directly with pleadings commencing an adversary proceeding, contested matter or other proceeding or action.

All of the above rights, claims, defenses, and remedies are hereby expressly reserved. The filing of this Statement and participating in these bankruptcy cases, or any of them, shall not be deemed to constitute a concession or admission of jurisdiction in the case or cases or before this court or any other court. SCPA does not consent to the bankruptcy court's jurisdiction or the jurisdiction of any other court. SCPA does not consent to the entry of final judgments, orders and/or decrees by the bankruptcy judge/bankruptcy court. At all times, SCPA demands a jury trial. SCPA does not consent to the bankruptcy court/bankruptcy judge conducting any jury trial.